

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
Baltimore Division

IN RE:

Shelby J. Massey
Debtor

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Case No.: 14-24539-DER

Chapter 13

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RESPONSE TO TRUSTEE'S MOTION
TO DISMISS FOR MATERIAL DEFAULT IN PAYMENTS

NOW COMES, Shelby J. Massey, Debtor, by and through her attorney, Nicholas J. Del Pizzo, III, and hereby responds to the Trustee's Second Motion to Dismiss for Material Default in Payments, and for cause states:

1. That the Debtor admits the allegations contained in Paragraph 1 of the Motion.
2. That the Debtor can not admit or deny the allegations contained in Paragraph 2 -4 of the Motion

WHEREFORE, the Debtor respectfully requests a hearing be held and this matter resolved at the hearing.

Respectfully submitted,

/s/Nicholas J. Del Pizzo, III
Nicholas J. Del Pizzo, III (24666)
7222 Holabird Avenue
Baltimore, MD 21222
410-288-5788
njdelpizzo@aol.com

DECLARATION

I HEREBY CERTIFY that the foregoing is true and correct to the best of my knowledge, information and belief.

/s/Shelby J. Massey
Shelby J. Massey
Debtor

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of June, 2015, the foregoing Response was electronically served on the Office of the US Trustee and the Trustee as registered CM/ECF participants as shown and a copy was mailed first class mail, postage prepaid to the Debtor address as shown below.

Shelby J. Massey
1315 Chesapeake Avenue
Middle River, MD 21220

/s/Nicholas J. Del Pizzo, III
Nicholas J. Del Pizzo, III